

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:

FCC Seeks Comment and Data on Actions to
Accelerate Adoption and Accessibility of
Broadband-Enabled Health Care Solutions and
Advanced Technologies

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GN Docket No. 16-46

**COMMENTS OF
THE NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL**

The National Public Safety Telecommunications Council (NPSTC) submits these comments in response to the Public Notice in the above captioned proceeding.¹ The Commission's Public Notice seeks input on a variety of issues concerning broadband-enabled health care. NPSTC views broadband communications to be an essential tool in the continuum of healthcare which includes the patients, medical professionals, hospitals, other health care facilities and emergency medical services (EMS).

In these comments, NPSTC highlights the potential benefits of broadband for EMS, which should be added as a key stakeholder in this proceeding. In addition, NPSTC attaches to these comments two reports on EMS that it believes will provide the Commission with helpful information. The NPSTC EMS Telemedicine Report incorporates feedback received from more than 670 agencies last year on the use of prehospital video care. The recently completed whitepaper entitled FirstNet and Public Safety Broadband Data, Implications for Rural EMS Organizations, provides significant focus on challenges experienced in rural areas.

¹ Public Notice, FCC Seeks Comment and Data on Actions to Accelerate Adoption and Accessibility of Broadband-Enabled Health Care Solutions and Advanced Technologies, GN Docket No. 16-46, released April 24, 2017.

The National Public Safety Telecommunications Council

The National Public Safety Telecommunications Council is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC has promoted implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations. NPSTC explores technologies and public policy involving public safety telecommunications, analyzes the ramifications of particular issues and submits comments to governmental bodies with the objective of furthering public safety telecommunications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications.

The following 16 organizations serve on NPSTC's Governing Board:²

- American Association of State Highway and Transportation Officials
- American Radio Relay League
- Association of Fish and Wildlife Agencies
- Association of Public-Safety Communications Officials-International
- Forestry Conservation Communications Association
- International Association of Chiefs of Police
- International Association of Emergency Managers
- International Association of Fire Chiefs
- International Municipal Signal Association
- National Association of State Chief Information Officers
- National Association of State Emergency Medical Services Officials
- National Association of State Foresters
- National Association of State Technology Directors
- National Council of Statewide Interoperability Coordinators
- National Emergency Number Association
- National Sheriffs' Association

² These comments represent the views of the NPSTC Governing Board member organizations.

Several federal agencies are liaison members of NPSTC. These include the Department of Homeland Security (the Federal Emergency Management Agency, the Office of Emergency Communications, the Office for Interoperability and Compatibility, and the SAFECOM Program); Department of Commerce (National Telecommunications and Information Administration); Department of the Interior; and the Department of Justice (National Institute of Justice, Communications Technology Program). Also, Public Safety Europe is a liaison member. NPSTC has relationships with associate members: The Canadian Interoperability Technology Interest Group (CITIG) and the Utilities Technology Council (UTC), and affiliate members: The Alliance for Telecommunications Industry Solutions (ATIS), Open Mobile Alliance (OMA), Telecommunications Industry Association (TIA), TETRA Critical Communications Association (TCCA), and Project 25 Technology Interest Group (PTIG).

NPSTC Comments

The Public Notice indicates the Commission has created a “Connect2Health^{FCC} Task Force” comprised of a senior-level, multi-disciplinary team that brings together the expertise of the Commission on the intersection of broadband, advanced technology, and health.³ The Commission also states further that the:

Public Notice seeks “comment, data, and information on a broad range of regulatory, policy, technical, and infrastructure issues related to the emerging broadband-enabled health *and* care ecosystem....The comment, data, and information requested are intended to provide the Commission with a broader understanding and perspective on the current state of broadband health technology and other related issues; and it will also inform the Task Force's work and recommendations.”⁴

³ Public Notice, Footnote 10.

⁴ Public Notice at page 3.

NPSTC applauds the Commission for releasing this Public Notice and for creating its Connect2Health^{FCC} Task Force to focus on broadband healthcare benefits and challenges. NPSTC concurs that broadband will be an essential tool in the continuum of healthcare which includes the patients, medical professionals, hospitals, other health care facilities and emergency medical services (EMS). Increasingly, modern healthcare relies on the electronic capture, storage and transmission of information within and among doctor's offices, hospitals, pharmacies and other health care facilities.

Many doctor's offices and hospitals have computers in each exam room on which nurses, physician assistants, and doctors can record information about a patient's health condition, vital signs, prescriptions administered, and other information. In some cases, e.g., for skin conditions, the information captured may include images as well as text information. Some doctor's offices provide an electronic tablet on which information can be captured, that travels with the patient from reception to the exam room and to other rooms such as labs for testing.

The use of electronic information by hospitals and doctor's offices is well established. As reliable wireless broadband communications becomes more prevalent, citizens will be able to benefit from home monitoring and the transmission of information to their doctor or other health professionals as well. Such home monitoring should enable more expeditious awareness of a change in a patient's health situation.

An important stakeholder in the health care continuum, not specifically mentioned in the Commission's Public Notice, are Emergency Medical Services (EMS). From a healthcare perspective, EMS provides an essential first response to those injured in accidents, having a heart attack or stroke or experiencing other sudden health problems. EMS often serves as an integral life-saving link with a hospital during the time a patient is cared for in the field and then

transported to an emergency department. These same EMS providers are now beginning to provide preventative and primary care in their communities. Called community paramedicine, this serves as a means of increasing access to affordable care, particularly in rural areas where hospitals may be reducing their services or closing and where specialists are abandoning in favor of practicing in urban centers.

The deployment of the nationwide public safety broadband network by the First Responder Network Authority (FirstNet) is expected to provide broadband capabilities EMS can leverage in its expeditious response to patients, intervention on medical emergencies, and provision of telemedicine support of community paramedicine. Going forward, EMS will need to link up even more with patients who are using home monitoring and with hospitals for consultation.

To assist the Commission and its Connect2Health^{FCC} Task Force, NPSTC is also providing two key reports regarding EMS as attachments to these comments. The NPSTC EMS Telemedicine Report dated February 24, 2016 addresses ways in which EMS is evolving as patient needs change and technology advances. The report highlights applications of emergency medical service telemedicine (EMST). As addressed in the report, these EMST applications can include 1) sending of video or pictures of patients or a patient's environment; 2) two-way conferencing among field providers, patients, and medical control or consulting staff; 3) sending diagnostic still or video images from ultrasound, eye/ear/nose/throat scopes, CT imagers, electronic stethoscopes or multi-vital sign monitoring devices; and 4) remotely monitoring, and perhaps adjusting, home or other remote patient diagnostic and treatment devices.

The NPSTC EMS Telemedicine Report also incorporates feedback received from more than 670 respondents on the use of prehospital video care. These respondents represent prehospital EMS

providers, hospital emergency department directors, trauma center directors, EMS medical directors, and online EMS medical control physicians. The report shows that 77% of the respondents favored the use of EMST over a series of patient care scenarios. However, the report also identifies some important issues and barriers that must be addressed. Accordingly, NPSTC believes the report should be of significant value to the Commission and its and its Connect2Health^{FCC} Task Force.

Again, rural areas often face additional challenges not necessarily characteristic of urban areas. EMS is no exception. Therefore, NPSTC and the National Association of State EMS Officials (NASEMSO) recently completed a whitepaper entitled “FirstNet and Public Safety Broadband Data, Implications for Rural EMS Organizations” dated May 18, 2017. This whitepaper highlights challenges in rural areas and includes a comparison across rural, suburban and urban areas of important factors for EMS such as reaction/response/transport times and the availability of resources, including personnel, training and technology. NPSTC believes the report will be of significant value to the Commission and its and its Connect2Health^{FCC} Task Force.

Conclusion

NPSTC applauds the Commission for releasing this Public Notice and for creating its Connect2Health^{FCC} Task Force to focus on broadband healthcare benefits and challenges. NPSTC also encourages the Commission and the task force to include EMS as a stakeholder in this important proceeding. While not specifically mentioned in the Public Notice, EMS is an essential element of the healthcare ecosystem. EMS serves as an essential first response to those injured in accidents, having a heart attack or stroke or experiencing other sudden health problems. EMS often serves as an integral life-saving link with a hospital during patient care in the field and then during

transport to an emergency department. It is also improving community access to affordable healthcare through community paramedicine.

Going forward, with the availability of the nationwide public safety broadband wireless network provided by FirstNet and consumer broadband offerings from multiple commercial carriers, EMS is expected to evolve. It can also have an increasingly important role to help patients and consult with doctors and hospitals as part of home healthcare monitoring.

NPSTC attaches as part of these comments two important reports, the NPSTC EMS Telemedicine Report, dated February 24, 2016 and the joint NPSTC/NASEMSO whitepaper “FirstNet and Public Safety Broadband Data, Implications for Rural EMS Organizations” dated May 18, 2017. As addressed herein, NPSTC believes these reports will provide valuable information to the Commission and its Connect2Health^{FCC} Task Force.

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May 24, 2017

Attachments:

NPSTC report - EMS Telemedicine Report, dated February 24, 2016

NPSTC/NASEMSO whitepaper - FirstNet and Public Safety Broadband Data, Implications for Rural EMS Organizations, dated May 18, 2017.